

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST by and through MARIELLE SHAVONNE SMITH and CHARIS HUMPHREY on behalf of its members; SHAKETA REDDEN; DORETHEA FRANKLIN; TANQUA SIMMONS; DE'JON HALL; JOSEPH BONDS; CHARLES PALMER; SHIRLEY SARMIENTO; EBONY YELDON; and JANE DOE, individually and on behalf of a class of all others similarly situated;

Plaintiffs,

v.

Civil No.: 1:18-cv-00719-CCR

CITY OF BUFFALO, NY; BYRON B. BROWN, Mayor of the City of Buffalo, in his individual and official capacities; BYRON C. LOCKWOOD, Commissioner of the Buffalo Police Department, in his individual and official capacities; DANIEL DERENDA, former Commissioner of the Buffalo Police Department, in his individual capacity; AARON YOUNG, KEVIN BRINKWORTH, PHILIP SERAFINI, ROBBIN THOMAS, UNKNOWN SUPERVISORY PERSONNEL 1-10, UNKNOWN OFFICERS 1-20, each officers of the Buffalo Police Department, in their individual capacities.

Defendants.

**STIPULATED MOTION FOR ADJOURNMENT
OF DEADLINE IN CASE MANAGEMENT ORDER**

The Parties respectfully move to amend the scheduling order to extend the motion to compel deadline by approximately a month and a half from December 18, 2024 to January 31, 2025.

In support of this motion, the Parties state as follows:

1. Under the present case management order, the deadline to file dispositive motions is December 18, 2024.

2. On November 12, 2023, the Parties met and conferred regarding outstanding discovery. Plaintiffs identified nine categories of information that they seek additional materials for.

3. The City searched for and either produced or indicated that no responsive materials exist in response to six of the nine categories.

4. The remaining categories require the City to produce voluminous body camera footage for individual traffic stops. Due to the sizes of body camera recordings, as well as IAD's obligation to continue to perform their day-to-day duties, the City cannot produce all of the requested footage before December 18, 2024. The Parties are collaborating to determine whether the requested body camera footage can be limited.

5. Accordingly, the Parties respectfully request that the motion to compel deadline be extended from December 18, 2024 to January 31, 2025.

6. The Parties thank the Court in advance for its consideration of this request.

Dated: Buffalo, New York
December 18, 2024

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CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2024, the above Stipulation Motion for Adjournment of Court-Ordered Deadlines was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Western District's Local Rules, and/or the Western District's Case Filing Rules & Instructions upon all counsel registered through the ECF System.

/s/ Peter A. Sahasrabudhe

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